

EPA REGISTRATION NUMBER 19713-600 - Part 2

PROCESSING REQUEST

Reg # 19713-600

Decision #494905

Description:

Material Available Electronically (see PPLS):

☒ Electronic Label/Letter Dated 3/18/15

☐ Other:

Material Sent (see jacket):

☐ Stamped Label/Letter Dated

☐ Notification Dated

☐ New CSF(s) Dated

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Sarah Meadows

Division: Registration Division

Phone: 347-0505

Date: 3/27/15



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 18, 2015

Luz G. Chan
Registration Manager
Drexel Chemical Company
PO Box 13327
Memphis, TN 38113-0327

Subject: Label Amendment – Use deletion – Grasses grown for seed
Product Name: Drexel Pendimethalin Technical
EPA Registration Number: 19713-600
Application Date: August 27, 2014
Decision Number: 494905

Dear Ms. Chan:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

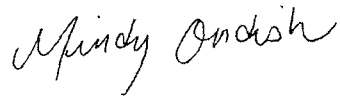
Continued on page 2

Page 2 of 2
EPA Reg. No. 19713-600
Decision No. 494905

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Sarah Meadows by phone at 703-347-0505, or via email at meadows.sarah@epa.com.

Sincerely,

A handwritten signature in cursive script that reads "Mindy Ondish".

Mindy Ondish
Acting Product Manager 25
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

Drexel

Pendimethalin Technical

Herbicide

For manufacturing use only.

ACTIVE INGREDIENT:

Pendimethalin..... 96.0%

OTHER INGREDIENTS: 4.0%

TOTAL:100.0%

Contains nitrosoamines at levels less than 100 ppm.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See FIRST AID Below

ACCEPTED

03/18/2015

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under

EPA Reg. No. 19713-600

EPA Reg. No. 19713-600

EPA Est. No. XXXXX-XX-XXX

Net Content: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- Call a poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, OR EXPOSURE) CALL CHEMTREC: 1-800-424-9300

600SP-1114*P

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or residues.

Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Each formulator is responsible for obtaining EPA registration for their formulated product(s).

Only for formulation into a herbicide for the following uses:

Landscape or Ground maintenance, Non-cropland areas, Ornamentals and Turfgrasses.

This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.

CONTAINER DISPOSAL:

Nonrefillable Container (Flexible-bag—all weights): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (Rigid—Greater than 50 Lbs.): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least once complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Refillable Container: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining content from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

WARRANTY—CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty, nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE expressed or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to Seller, and Buyer assumes the risk of any such use. To the extent consistent with applicable law, Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

Manufactured For:



Drexel Chemical Company
P.O. BOX 13327, MEMPHIS, TN 38113-0327
SINCE 1972

The Drexel logo is a registered trademark of Drexel Chemical Company.



Drexel Chemical Company

August 27, 2014

Document Processing Desk (**AMEND**)
ATTN: MR. BO DAVIS, PM 25
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive, Arlington, VA 22202

***Re: Submission of Revised Label Deleting Grass Grown For Seed Use
DREXEL PENDIMETHALIN TECHNICAL (EPA Reg. No. 19713-600)***

Dear Mr. Davis,

In accordance with Section 6(f) of FIFRA as amended (7 U.S.C. 136 d(f), Drexel Chemical Company would like to request voluntary cancellation of the following use from the label of the above registration that was accepted by the Agency on June 24, 2014:

- Grass Grown For Seed

In making this voluntary termination of uses request, Drexel also expressly requests a waiver of the 180-day comment period provided by the statute.

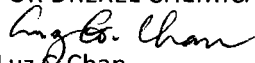
Enclosed, please find:

1. Completed EPA Form 8570-1
2. One copy of the label (600SP-0614*) accepted by the Agency on June 24, 2014 with Grass Grown For Seed marked up deleted.
3. Three clean copies of the label (600SP-0814*P) for your acceptance.

If you have questions/clarification or need anything further regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY


Luz Chan

Registration Manager

1700 Channel Avenue • Post Office Box 13327 • Memphis, Tennessee 38113-0327
Phone: (901) 774-4370 • Fax: (901) 774-4666 • E-Mail: info@drexchem.com • www.DrexChem.com

SINCE 1972



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-600	2. EPA Product Manager Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PENDIMETHALIN TECHNICAL	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of revised label deleting Grass Grown For Seed use. Details are in the cover letter accompanying this submission.
Thank you.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Luz G Chan	Title Registration Manager	Telephone No. (Include Area Code) (901) 774-4370	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Registration Manager	
4. Typed Name Luz G Chan		5. Date August 27, 2014	

Material Sent for Data Extraction

Reg. # 19713-600

Description: _____

☐ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated _____

☐ Notification Dated _____

☒ New CSF(s) Dated Att # 2 (dated 01-19-15)

☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Janita Gulchert

Phone: 305-6965 Division: RD/HB

Date: 03-11-15



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MAR 10 2014

Ms. Luz G. Chan
Registration Manager
Drexel Chemical Company
PO Box 13327
Memphis, TN 38113-0327

Subject: CSF Amendment – Revised Formulation, Alternate #2 CSF
Product Name: Drexel Pendimethalin Technical
EPA Registration Number: 19713-600
Application Date: January 19, 2015
Decision Number: 499529

Dear Ms. Chan:

The Confidential Statement of Formula (CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended is acceptable.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 03-07-2006
- Alternate CSF 1 dated 03-21-2014
- Alternate CSF 2 dated 01-19-2015

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, please contact Juanita Gilchrist by phone at (703) 305-6965, or via email at gilchrist.juanita@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Mindy Ondish", is written above the typed name.

Mindy Ondish, Acting Product Manager 25
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Memorandum to File

March 10, 2015

Reg. # Re: 19713-600

Decision# 499529

Subject: Presence of an Inert not previously cited, Alternate #2 (dated 01-19-15)

Alternate #2 CSF (dated 01-19-15) was presented to both Shyam and Byron on 3/4/15 to assess a potential concern with respect to the inert ingredient on row 5. It was their expressed opinions that "the stated amount was not significant and not expected to have an adverse effect". Additionally, per Byron, no additional changes to the PPE are required at this time.

Jgilchrist



United States
Environmental Protection Agency
Washington, DC 20460

☐
☒
☐

Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-600	2. EPA Product Manager Mindy Ondish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PENDIMETHALIN TECHNICAL	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of Alternative CSF#2 with minor changes. Details are in the cover letter accompanying this submission.
Thank you.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

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Name Luz G Chan	Title Registration Manager	Telephone No. (Include Area Code) (901) 774-4370
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
Signature 	3. Title Registration Manager	
Typed Name Luz G Chan	5. Date January 19, 2015	



Drexel Chemical Company

January 19, 2015

Fast Track

Document Processing Desk (**AMEND**)
ATTN: Ms. Mindy Ondish (Acting PM 25)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Re: *Submission of Alternative CSF #2*
DREXEL PENDIMETHALIN TECHNICAL (Reg. No. 19713-600)

Dear Ms. Ondish,

Further to Mr. Scott Pace's telephone communication with Dr. Shyam Mathur last week regarding the above, please find for your acceptance alternative CSF#2 with minor amendment. We kindly request fast track review of this submission.

Please find:

1. Completed EPA Form 8570-1
2. Copy of the currently accepted basic CSF dated March 7, 2006 for this product.
3. Two copies of alternative CSF#2 with the minor change. (I highlighted the changes for easy reference.)
4. Copy of the Certificate of Analysis of five batches of the product from the producer supporting CSF#2.

If you have questions/clarification regarding this submission, please feel free to contact Dr. Shyam Mathur. You may also contact Scott Pace or myself at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
DREXEL CHEMICAL COMPANY


Luz G Chan
Registration Manager

cc. Dr. Shyam Mathur, Technical Review Branch



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

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Thank you.

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Section - IV

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2. Signature 	3. Title Registration Manager		
4. Typed Name Luz G Chan	5. Date January 19, 2015		



Drexel Chemical Company

January 19, 2015

Fast Track

Document Processing Desk (**AMEND**)
ATTN: Ms. Mindy Ondish (Acting PM 25)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Re: Submission of Alternative CSF #2
DREXEL PENDIMETHALIN TECHNICAL (Reg. No. 19713-600)

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If you have questions/clarification regarding this submission, please feel free to contact Dr. Shyam Mathur. You may also contact Scott Pace or myself at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
DREXEL CHEMICAL COMPANY

Luz G Chan
Registration Manager

cc. Dr. Shyam Mathur, Technical Review Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 21, 2015

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

LUZ G. CHAN
DREXEL CHEMICAL COMPANY
PO Box 13327
MEMPHIS, TN 38113-0327

PRODUCT NAME: DREXEL PENDIMETHALIN TECHNICAL
COMPANY NAME: DREXEL CHEMICAL COMPANY
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 19713-600
EPA RECEIPT DATE: 01/20/15

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 25, at (703) 605-0723.

Sincerely,

A handwritten signature in black ink, appearing to be "JG" or similar, is placed below the word "Sincerely,".

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



Fee for Service

{9630664~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 25

Receipt No.

S-

963066

EPA File Symbol/Reg. No.

19713-600

Pin-Punch Date:

1/20/2015

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ ____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Venus Eager

Date: 1/21/15

Remarks:

PROCESSING REQUEST

Reg #: 19713-600 Decision #: 489151

Description: NEW CSF

Material Available Electronically (see PPLS):

☐ Electronic Label/Letter Dated:

☒ Other: LETTER DATED 11/5/14

Material Sent (see jacket):

☐ Stamped Label/Letter Dated:

☐ Notification Dated:

☒ New CSF(s) Dated: 3/21/14

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: SARAH MEADOWS

Division: RD

Phone: 347-0505

Date: 11/6/14

Material Sent for Data Extraction

Reg # 19713-600

Description: USE Deletions

Material(s) Sent to Data Extraction Contractors:

- ☒ New Stamped Label Dated 6/24/14
- ☐ Notification Dated _____
- ☐ New CSF(s) Dated _____
- ☐ Other: _____

Decision #: 487799

Other Action/Comments: _____

Do not file this cover sheet. Please discard after processing.

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: Mindy Ondish

Phone: (703)605-0723 Division: RD/PM Team 25

Date: 11/6/14

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 5, 2014

Luz Chan
Registration Manager
Drexel Chemical Company
1700 Channel Ave.
PO Box 13327
Memphis, TN 38113

Subject: CSF Amendment – Addition of an Alternate CSF 1 with an Unregistered Source
of Active Ingredient
Product Name: Drexel Pendimethalin Technical
EPA Registration Number: 19713-600
Application Date: March 25, 2014
Decision Number: 489151

Dear Ms. Chan:

The Confidential Statement of Formula (CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 3/7/2006
- Alternate CSF 1 dated 3/21/2014

Any CSFs other than those listed above are superseded/no longer valid. A copy of our review dated October 24, 2014 is enclosed for your reference. If you have any questions, please contact Sarah Meadows by phone at 703-347-0505, or via email at meadows.sarah@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Mindy Ondish".

Mindy Ondish, Acting Product Manager 25
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure
Kitchens, B. F. 2014. Product Chemistry Review of Pendimethalin Technical



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

DP Barcode No.: D419331
PC Code: 108501
Food Use: No

File Symbol No.: 19713-600
Action Code: R 351
Product Name: Drexel Pendimethalin Technical

Decision No.: 489151

Date: October 24, 2014

SUBJECT: Product Chemistry Review of Pendimethalin Technical

FROM: Bruce F. Kitchens, Chemist
Chemistry, Inerts and Toxicology Assessment Branch (7505P)
Registration Division (7505P)

TO: RM #25, Kable Davis/Sarah Meadows
Herbicide Branch
Registration Division (7505P)

Bruce F. Kitchens
24 Oct 2014

SBW 10-24-14

INTRODUCTION:

The registrant, Drexel Chemical Company, is submitting an application to amend the registered manufacturing use product, Drexel Pendimethalin Technical. This amendment is the result of the use of an alternate source of the active ingredient. The proposed source is produced at an alternate manufacturing site. The active ingredient in this product is Pendimethalin at a label nominal concentration of 96% a.i. This product is intended for use in the manufacture of herbicide end-use products. In support of this request, the registrant has submitted an alternate Confidential Statement of Formula (CSF) dated 21 Mar 2014 and product chemistry data contained in MRID# 493487-01. The Chemistry, Inert and Toxicology Assessment Branch (CITAB) has been asked to review this submission.

SUMMARY OF FINDINGS:

TRB has reviewed this submission and reports the following findings:

1. This product is produced from an integrated formulation system. This means that the product is the result of intended chemical reactions.
2. All impurities have been assayed and identified by the registrant. The registrant has declared [REDACTED] impurity of toxicological concern in this product. See the confidential appendix for details. All impurities have a nominal concentration and upper certified limits.
3. The nominal concentration of the active ingredient listed on the proposed alternate CSF and the current basic CSF are different (98.2% vs. 96.0%). The nominal concentration of the active ingredient on the proposed alternate formula is acceptable as it falls within the certified limits for the active ingredient nominal concentration on the current basic formula dated 07 Mar 2006.

Manufacturing process information may be entitled to confidential treatment

Manufacturing process information may be entitled to confidential treatment

DP Barcode No.: D419331

File Symbol No.: 19713-600

Decision No.: 489151

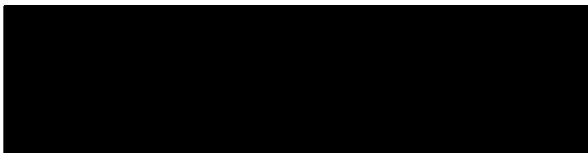
PC Code: 108501

Action Code: R 351

Food Use: No

Product Name: Drexel Pendimethalin Technical

4. The alternate production site is:



CONCLUSIONS:

CITAB has reviewed this submission and concludes the following:

1. The proposed alternate formula CSF for the manufacturing use product, Drexel Pendimethalin Technical dated 21 Mar 2014 is acceptable.
2. This submission satisfies the data requirements as specified in 40 CFR 158.320, 158.325, 158.330, 158.340, 158.345, 158.350, and 158.355 with respect to product identity and composition, description of materials used to produce the product, description of the production process, discussion of formation of impurities, preliminary analysis, certified limits, and enforcement analytical method.
3. This proposed alternate formula for Pendimethalin Technical dated 21 Mar 2014 meets the criteria specified in 40 CFR 152.43 with respect to alternate formulations.
4. HED (Health Effects Division) has evaluated the presence of the relevant impurity found in the active ingredient preliminary analysis and concluded the following:

HED estimated the cancer risk for the noted impurity at the upper certified limit [REDACTED] using a slope factor of $7.0 \text{ (mg/kg/day)}^{-1}$ which is the median slope factor for nitrosamine compounds currently on IRIS. The cancer risk for general population is estimated to be 1×10^{-7} . Considering the conservatism used in the estimation of the cancer risk in respect to the level and the potency (slope) factor, HED has no further concerns for that impurity. A detailed discussion of the toxicity and analysis may be found in the Confidential Appendix to this memorandum.

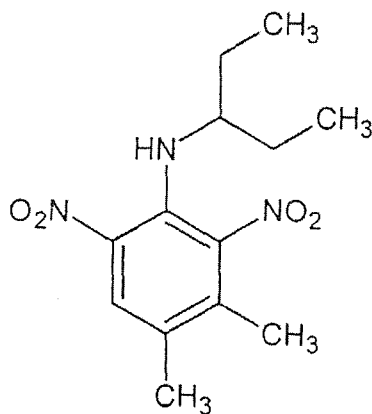
DP Barcode No.: D419331
PC Code: 108501
Food Use: No

File Symbol No.: 19713-600
Action Code: R 351
Product Name: Pendimethalin Technical

Decision No.: 489151

830.1550. Product Identity & Composition:

Common Name:	Pendimethalin
Chemical Name (CAS): (IUPAC):	N-(1-ethylpropyl)-3,4-dimethyl-2,6-dinitrobenzenamine N-(1-ethylpropyl)-2,6-dinitro-3,4-xylidene
CAS No.:	40487-42-1
PC Code No.:	108501
Empirical formula:	$C_{13}H_{19}N_3O_4$
Molecular Weight:	281.3 g/mol
Structural formula:	



Pendimethalin

DP Barcode No.: D419331

File Symbol No.: 19713-600

Decision No.: 489151

PC Code: 108501

Action Code: R 351

Food Use: No

Product Name: Pendimethalin Technical

Table 1. Manufacturing and Impurity Data for Pendimethalin Technical				
GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and Composition	493487-01	A	The nominal concentration of the active ingredient as determined in the 5-batch analysis is 98.2%. This value is higher than the label claim. Impurities ($\geq 0.1\%$) are listed on the CSF.
830.1600	Description of Materials Used to Produce the Product	493487-01	A	The product specification for all the starting materials have been provided by the registrant.
830.1620	Description of Production Process	493487-01	A	The AI was produced in a three step integrated process. The production process has been described schematically but full details of the production process were not provided.
830.1670	Discussion of Formation of Impurities	493487-01	A	The registrant has provided the complete mechanisms of formation, quantification and identification of all the impurities present at the levels of $\geq 0.1\%$. Impurities have been listed on the CSF including. A relevant impurity is also listed on the proposed alternate CSF. See confidential appendix for details.
830.1700	Preliminary Analysis	493487-01	A	The registrant has provided 5 batch analysis for the TGAI. The AI & impurities were identified and quantified by using GC/FID and HPLC/UV using internal and external standard, respectively. The methods were validated for accuracy, linearity, repeatability and precision. The five batch analysis supported the CSF for the proposed alternate formula.
830.1750	Certified Limits	see csf 3/21/14	A	The proposed certified limits for the AI & for the impurities are based on the five batch analytical results.
830.1800	Enforcement Analytical Method	493487-01	A	A GC-FID analysis using an external standard was used for the determination of the active ingredient and significant impurities ($>0.05\%$ w/w). A relevant impurity was determined by HPLC using an external standard and MS/MS detector. Methods were validated for linearity, precision, repeatability and accuracy. Karl Fischer method was used to determine moisture content.
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)				

DP Barcode No.: D419331

File Symbol No.: 19713-600

Decision No.: 489151

PC Code: 108501

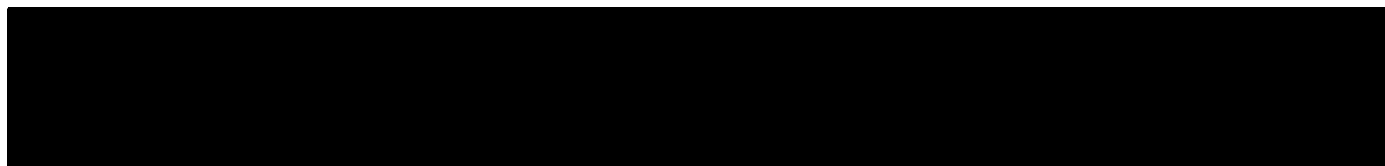
Action Code: R 351

Food Use: No

Product Name: Pendimethalin Technical

CONFIDENTIAL APPENDIX

830.1670. Discussion of the Formation of Impurities: (MRID NO. 493487-01)



HED estimated the cancer risk for the noted impurity at the upper certified limit [REDACTED] using a slope factor of $7.0 \text{ (mg/kg/day)}^{-1}$ which is the median slope factor for nitrosamine compounds currently on IRIS. The cancer risk for general population is estimated to be 1×10^{-7} . Considering the conservatism used in the estimation of the cancer risk in respect to the level and the potency (slope) factor, HED has no further concerns for that impurity. A detailed discussion of the toxicity and analysis may be found in the Confidential Appendix to this memorandum.

DP Barcode No.: D419331

File Symbol No.: 19713-600

Decision No.: 489151

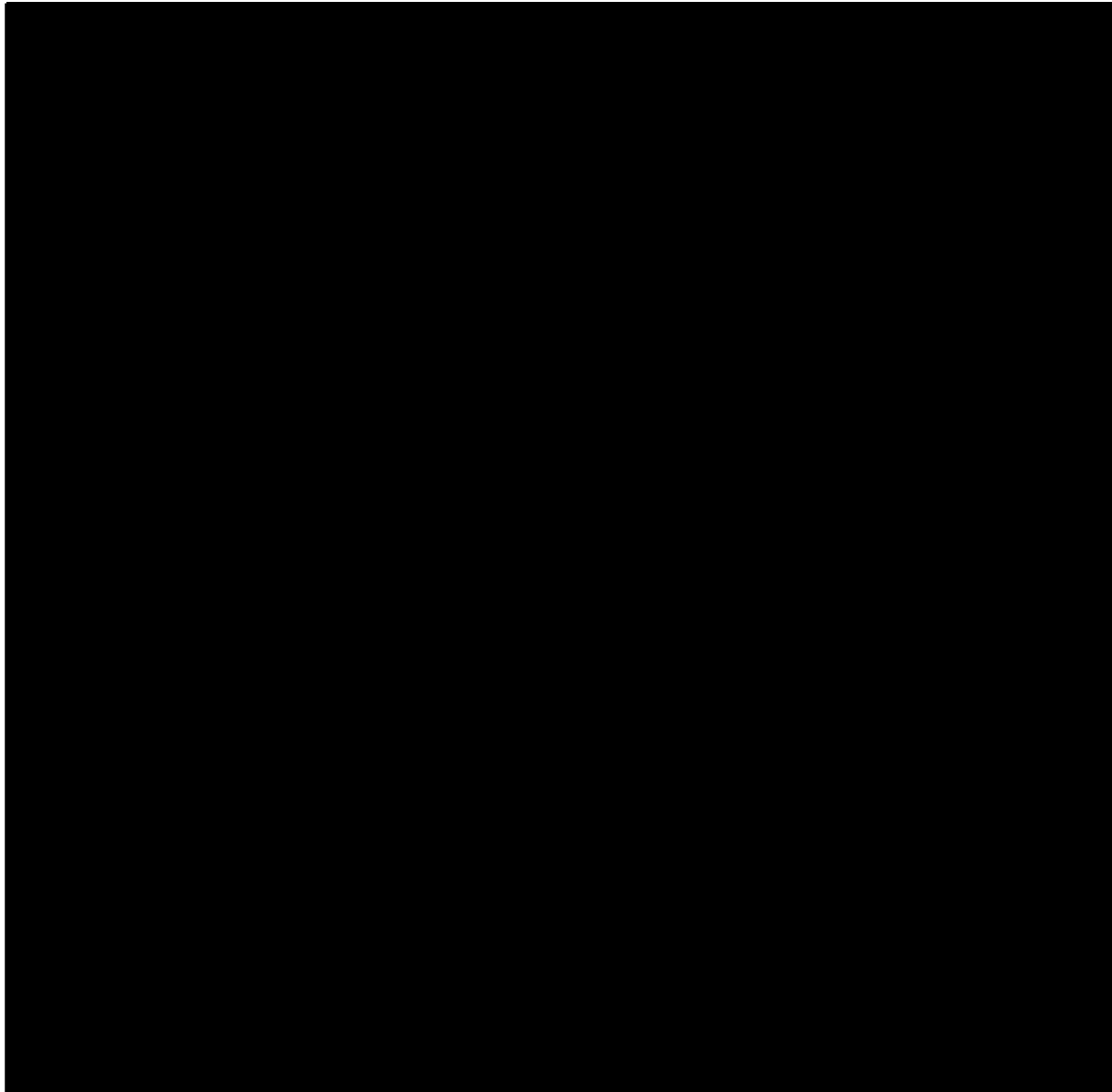
PC Code: 108501

Action Code: R 351

Food Use: No

Product Name: Pendimethalin Technical

CONFIDENTIAL APPENDIX



DP Barcode No.: D419331
PC Code: 108501
Food Use: No

File Symbol No.: 19713-600
Action Code: R 351
Product Name: Pendimethalin Technical

Decision No.: 489151



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

MEMORANDUM

Date: 9-OCT-2014

Subject: **Pendimethalin:** EPA Reg. No. 19713-600. Impurities Discussion for New Formulation.

PC Code: 108501
Decision No.: 489151
Petition No.: NA
Risk Assessment Type: NA
TXR No.: NA
MRID No.: NA

DP Barcode: D420069
Registration No.: 19713-600
Regulatory Action: New Registration
Case No.: 187
CAS No.: 40487-42-1
40 CFR: 180.361

From: Mohsen Sahafeyan, Chemist *Mohsen Sahafeyan*
Risk Assessment Branch 6/Health Effects Division (RAB6/HED) (7509P)

Through: Donna Davis, Acting Branch Chief *Donna Davis*
Registration Action Branch VI
Health Effects Division (7509P)
and
Ray Kent, Ph.D., Senior Scientist *Ray Kent*
Health Effects Division (7509P)

To: Sarah Meadows/Kable Davis
Herbicide Branch
Registration Division (7505P)

I. Action Requested

Drexel chemical company has submitted an alternate CSF with the intent to add a new facility in [REDACTED]. The new alternate CSF contains a different impurity profile from the currently registered TGAI. The Registration Division (RD) has requested HED comment on that impurity and its potential effects on the toxicity of the TGAI.

DP Barcode No.: D419331

File Symbol No.: 19713-600

Decision No.: 489151

PC Code: 108501

Action Code: R 351

Food Use: No

Product Name: Pendimethalin Technical

Manufacturing process information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX:

II. HED Conclusions

HED estimated the cancer risk for the noted impurity at the upper certified limit [REDACTED] using a slope factor of $7.0 \text{ (mg/kg/day)}^{-1}$ which is the median slope factor for nitrosamine compounds currently on IRIS. The cancer risk for general population is estimated to be 1×10^{-7} .

Considering the conservatism used in the estimation of the cancer risk in respect to the level and the potency (slope) factor, HED has no further concerns for that impurity. A detailed discussion of the toxicity and analysis may be found in the Confidential Appendix to this memorandum.

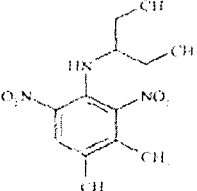
Attachments:

Confidential Appendix

Confidential Appendix to D420069**Impurity Description**

The Registration Division inquired about an impurity in the proposed confidential statement of formula for EPA reg. no. 19713-600, which is shown in Table A-1. In addition to an expert review of the toxicity databases of similar chemicals, IED used a qualitative toxicity prediction tool, DEREK (Derek Nexus: 4.0.6, Nexus: 1.7.6), to conduct a qualitative structure-activity relationship analysis for the parent and metabolites. The DEREK reports are available upon request.

Table 1. Parent and Subject Impurity for EPA Reg. No. 19713-600.

Chemical	Structure	NC	UCL	LCL
Pendimethalin CAS name: N-(1-ethylpropyl)- 3,4-dimethyl-2,6- dinitrobenzenamine CAS No. 40487-42-1		98.20	100.00	95.25

Pendimethalin Hazard Characterization

Reference: S. Shelat, DP Barcode: D400606, 8/29/12.

Pendimethalin has a low acute toxicity via oral, dermal, or inhalation route. It is not a dermal or eye irritant; and is not a dermal sensitizer. The thyroid is a target organ for pendimethalin. Thyroid toxicity in chronic and subchronic rat and mouse studies was manifested as alterations in thyroid hormones (decreased total T4, and T3, increased percent of free T4 and T3), increased thyroid weight, and microscopic thyroid lesions (including increased thyroid follicular cell height, follicular cell hyperplasia, as well as follicular cell adenomas). No developmental effects were seen in rabbit or rat developmental toxicity studies and no reproductive or offspring effects were seen in the 2-generation rat reproduction study. A developmental thyroid study was submitted to demonstrate that there was no concern for toxicity to the thyroid glands in the fetus/offspring. There is no evidence of neurotoxicity or immunotoxicity from exposure to pendimethalin. The Agency has concluded that the FQPA Safety Factor should be reduced (equivalent to 1X) based on the completeness of the toxicology and exposure data base, lack of evidence for increased susceptibility following pre and post natal exposures, and no residual

DP Barcode No.: D419331
PC Code: 108501
Food Use: No

File Symbol No.: 19713-600
Action Code: R 351
Product Name: Pendimethalin Technical

Decision No.: 489151

uncertainty. Pendimethalin is classified as a "possible human carcinogen" based on a statistically significant increased trend and pair-wise comparison between the high dose group and controls for thyroid follicular cell adenomas in male and female rats. A non-linear approach (i.e., RfD approach) was recommended for quantification of cancer risk since mode of action studies are available to demonstrate that the thyroid tumors are due to a thyroid-pituitary imbalance, and to establish a hormonal mode of action for thyroid tumors. Additionally, pendimethalin was shown to be non-mutagenic in mammalian somatic cells and germ cells.

The following table contains the summary of DEREK runs for pendimethalin and its nitroso-compound impurity found in the new technical (Reg No. 19713-600).

Table 2. Summary of DEREK Results For Pendimethalin And Its Impurity.		
DEREK ALERT	PARENT	Nitroso Compound ¹
Carcinogenicity in mammals	YES	YES
Chromosome damage (in vitro & vivo) in mammal	YES	YES
Hepatotoxicity in mammal	YES	YES
Mutagenicity in vitro in bacterium	YES	YES
Teratogenicity in mammal	NO	YES
Other Alerts	NO	YES (skin sensitization)

¹ EPA has allowed up to 1 ppm of nitroso-compounds in the product to be registered without further requirement of exposure and risk data (Federal Register / Vol. 45, No. 124 / Wednesday, June 25, 1980).

HED Conclusions

HED estimated the cancer risk for the noted impurity [REDACTED] at the upper certified limit [REDACTED] using the slope factor for *N*-Nitrosodi-*n*-propylamine which is the median slope factor for nitrosamine compounds currently on EPA's IRIS database. The slope factor for *N*-Nitrosodi-*n*-propylamine of 7.0 (mg/kg/day)⁻¹] was adjusted to [REDACTED]

[REDACTED] This value was used as an endpoint for the last chronic cancer dietary risk assessment (Y. Barnes, DP# 401100, 5/2/2012) which was conducted with conservative (upper bound) assumptions; residues of pendimethalin for any registered commodity were assumed to be at the tolerance level with 100% of that commodity being treated.

DP Barcode No.: D419331

File Symbol No.: 19713-600

Decision No.: 489151

PC Code: 108501

Action Code: R 351

Food Use: No

Product Name: Pendimethalin Technical



PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 3-27-14

Experts In-Processing Signature: B.B.

Date 3-28-14

Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>19713-600</u>		EPA Receipt Date: <u>3-27-14</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	X				
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (<u>Electronic labels on CD</u> are encouraged and guidance is available)					X
7	Is the data package consistent with PR Notice 86-5			X		
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
	<u>Required Data</u> and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

Comments:

Documentation : Pass

• required forms are complete

Inerts : N/A

• technical & impurities only, no inerts to review

II-3 : Pass

MRID 493487

Status : Pass

VC 4/7/2014

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 28, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-489151
EPA File Symbol or Registration Number: 19713-600
Product Name: PENDIMETHALIN TECHNICAL
EPA Receipt Date: 27-Mar-2014
EPA Company Number: 19713
Company Name: DREXEL CHEMICAL COMPANY

LUZ G. CHAN
DREXEL CHEMICAL COMPANY
PO Box 13327
MEMPHIS, TN 38113-0327

SUBJECT: Receipt of Registration Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your amendment and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R351

AMENDMENT;UNREGISTERED SOURCE OF ACTIVE INGREDIENT;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

A handwritten signature in cursive script, appearing to read "Teresa Brown".

Front End Processing Staff

Information Technology & Resources Management Division



Drexel Chemical Company

March 25, 2014

Document Processing Desk (REGFEE)
ATTN: Mr. Bo Davis, PM 25
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive, Arlington, VA 22202

**Re: Submission of Alternate CSF Adding an Unregistered Source of TGA
Drexel Pendimethalin Technical (Reg. No. 19713-600)**

Dear Mr. Davis:

In support of the above, please find enclosed the following:

- 1. Check for \$12,596.00 to cover PRIA fee for Code Action R351**
- 2. Application 8570-1**
- 3. Two copies of the proposed Alternate CSF dated 03/21/2014**
- 4. Data Matrix**
- 5. Certification with Respect to Citation of Data**
- 6. Three (3) copies of the following study:**

**Product Identity, Composition and Analysis of Pendimethalin Technical (DRXL 201407)
(OPPTS 830.1550, 830.1600, 830.1620, 830.1670, 830.1700, 830.1750, 830.1800)**

**If you have any questions or need clarification, please contact us at (901) 774-4370 or e-mail
lchan@drexchem.com. Thank you.**

**Respectfully yours,
FOR DREXEL CHEMICAL COMPANY**

Luz G Chan
Luz G Chan

Registration Manager



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-600	2. EPA Product Manager Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PENDIMETHALIN TECHNICAL	PM# 25/Herbicide Branch	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of alternate CSF. Details are in the cover letter accompanying this submission. Thank you.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Luz G Chan	Title Registration Manager	Telephone No. (Include Area Code) (901) 774-4370
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Registration Manager	
4. Typed Name Luz G Chan	5. Date March 25, 2014	




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date March 25, 2014			EPA Reg No./File Symbol 19713-600		Page 1 of 6
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data:					
830.1550	Product identity and composition	TBD	Drexel Chemical Company	Own	
830.1600	Description of materials used to produce the product	TBD	Drexel Chemical Company	Own	
830.1620	Description of production process	TBD	Drexel Chemical Company	Own	
830.1650	Description of Formulation Process	-	-	-	1
830.1670	Discussion of formation of impurities	TBD	Drexel Chemical Company	Own	
830.1700	Preliminary analysis	TBD	Drexel Chemical Company	Own	
830.1750	Certified Limits	TBD	Drexel Chemical Company	Own	Refer to CSF
830.1800	Enforcement analytical method	TBD	Drexel Chemical Company	Own	
830.1900	Submittal of samples	-	-	-	2
830.6302	Color	46361302	Drexel Chemical Company	Own	
830.6303	Physical state	43361302	Drexel Chemical Company	Own	
830.6304	Odor	46861302	Drexel Chemical Company	Own	
830.6313	Stability to normal & elevated temp., meta', metal ions	46861302	Drexel Chemical Company	Own	
830.6314	Oxidation/Reduction Reaction	46861302	Drexel Chemical Company	Own	
Signature 			Name and Title Scott Pace, Director of Registration Division		Date 03/21/2014

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

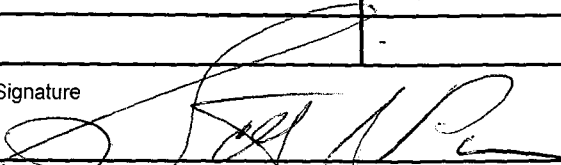


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DATA MATRIX

Date March 25, 2014			EPA Reg No./File Symbol 19713-600		Page 2 of 6
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6315	Flammability	-	-	-	3
830.6316	Explosibility	-	-	-	4
830.6317	Storage stability	-	-	-	5
830.6319	Miscibility	-	-	-	6
830.6320	Corrosion characteristics	-	-	-	7
830.6321	Dielectric breakdown voltage	-	-	-	8
830.7000	pH	-	-	-	9
830.7050	UV/Visible absorption	-	-	-	10
830.7100	Viscosity	-	-	-	11
830.7200	Melting point	46861302	Drexel Chemical Company	Own	
830.7220	Boiling point	46361302	Drexel Chemical Company	Own	
830.7300	Density/Relative Density/Bulk Density	46361302	Drexel Chemical Company	Own	
830.7370	Dissociation constants in water	46861302	Drexel Chemical Company	Own	
830.7550	Partition coefficient	46861302	Drexel Chemical Company	Own	
-	-	-	-	-	
Signature 			Name and Title Scott Pace, Director of Registration Division		Date 03/21/2014

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

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DATA MATRIX

Date March 21, 2014			EPA Reg No./File Symbol 19713-600		Page 3 of 6
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water solubility	46861302	Drexel Chemical Company	Own	
830.7950	Vapor pressure	46861302	Drexel Chemical Company	Own	
870.1100	Acute oral	Cite all	BASF Corporation	Pay	
870.1200	Acute dermal	Cite all	BASF Corporation	Pay	
870.1300	Acute inhalation	Cite all	BASF Corporation	Pay	
870.2400	Primary eye irritation	Cite all	BASF Corporation	Pay	
870.2500	Primary dermal irritation	Cite all	BASF Corporation	Pay	
870.2600	Dermal sensitization	Cite all	BASF Corporation	Pay	
GENERIC DATA:					
Cite all	Cite all	Cite all	BASF Corporation	Pay	
			Bayer CropScience	Pay	
			FMC Corp. Agricultural Products Group	Pay	
			E.I. Du Pont de Nemours	Pay	
			Scotts Company	Pay	
			Southern States Cooperative, Inc.	Pay	
Signature 			Name and Title Scott Pace, Director of Registration Division		Date 03/21/2014



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date March 21, 2014

EPA Reg No./File Symbol 19713-600

Page 4 of 6

Applicant's/Registrant's Name & Address

DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327

Product

DREXEL PENDIMETHALIN TECHNICAL

Ingredient Pendimethalin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Cite all	Cite all	Cite all	The Anderson Lawn Fertilizer Division	Pay	
			Lesco, Inc.	Pay	
			Loveland Products	Pay	
			Howard Fertilizer & Chemical Co.	Pay	
			Harrell's LLC	Pay	
			Control Solutions, Inc.	Pay	
			Cedar Chemical Corp.	Pay	
			Everris NA, Inc.	Pay	
			Repar Corporation	Pay	
			United Phosphorus, Inc	Pay	
			Spray Drift Task Force	Own	
			Outdoor Residential Exposure Task Force	Own	
			Agricultural Reentry Task Force	Own	
			Generic Endangered Species Task Force	Own	
			Residential Exposure Joint Venture Task Force	Pay	

Signature

Name and Title

Scott Pace, Director of Registration Division

Date

03/21/2014

DATA MATRIX NOTES

- 1 **Description of Formulation Process:** Not applicable because product is a TGA/MP.
- 2 **Submittal of Samples:** Not required at this time.
- 3 **Flammability:** Not applicable. Product does not contain combustible liquids.
- 4 **Explosibility:** Not applicable. Product is not potentially explosive.
- 5 **Storage stability:** Will be submitted at a later date when study is completed.
- 6 **Miscibility:** Not applicable. Product is a solid and for manufacturing use only.
- 7 **Corrosion characteristics:** Will be submitted at a later date when study is completed.
- 8 **Dielectric breakdown voltage:** Not applicable. Product is not intended for use around electrical equipment. Product is for manufacturing use only.
- 9 **pH:** Not applicable. Product is in solid form and is not dispersible in water.
- 10 **UV Visible Absorption:** Drexel is citing the uv-vis data e-mailed by our staff, Ms. Kedra Wherry, to Dr. Shyam Mathur on December 18, 2006 for Drexel Pendimethalin Technical (Reg. No. 19713-600).
- 11 **Viscosity:** Not applicable. Product is a solid.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Drexel Chemical Company, P.O. Box 13327, Memphis, TN 38113-0327 (Tel 901 774-4370)	EPA Registration Number/File Symbol 19713-600
Active Ingredient(s) and/or representative test compound(s) Pendimethalin	Date 03/21/2014
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) errestrial non-food crops	Product Name DREXEL PENDIMETHALIN TECHNICAL

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

Submission of alternate CSF adding an unregistered source of technical.

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 03/21/2014	Typed or Printed Name and Title SCOTT PACE, Director of Registration Division
---------------	--------------------	--



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Luz G. Chan
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113

FEB 06 2014

Subject: Unacceptable Label Notification – Deletion of Uses
Drexel Pendimethalin Technical
EPA Reg. No.: 19713-600
Application dated: January 22, 2014

Dear Ms. Chan:

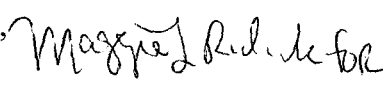
The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 1/22/14 for Drexel Pendimethalin Technical.

The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested does not clearly fall within the scope of this notice and will require additional administrative review of the related files. A summary of our findings include:

1. **Deletion of use sites must be submitted as amendments**
2. **Amendments for use deletions must be accompanied by a request for voluntary cancellation as described in section 6(f) of FIFRA. FIFRA requires the Agency to publish 6(f) requests in the *Federal Register* and provide an opportunity for public comment on the requested use deletion before EPA may act upon such a request.**

Please be advised that PRNs are provided as guidance; they are not considered regulation by the Agency. Therefore, the RD reserves the right to make the above determination and concludes that this action must be submitted by you as an amendment. No further processing of this action will occur until a resubmission is made. The RD has determined that this action is denied and our records have been updated accordingly.

If you have any questions regarding this letter, contact Maggie Rudick at (703) 347-0257 or rudick.maggie@epa.gov.

Sincerely, 
Kable Bo Davis; Product Manager 25
Herbicide Branch
Registration Division (7505P)



Drexel Chemical Company

January 22, 2014

Document Processing Desk (NOTIF)
ATTN: MR. BO DAVIS, PM 25
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive, Arlington, VA 22202

Re: Submission of Revised Label Deleting Uses by Notification
DREXEL PENDIMETHALIN TECHNICAL (EPA Reg. No. 19713-600)

Dear Mr. Davis,

Drexel would like to submit a revised label deleting all the uses that were added to the label and accepted by the Agency on February 2, 2009.

Enclosed, please find:

1. Completed EPA Form 8570-1
2. Copy of the label (600SP-0209*) accepted by the Agency on February 2, 2009 with the added uses marked up for deletion.
3. Clean copy of the label (600SP-0114*P) for your acceptance.

If you have questions/clarification or need anything further regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY

Luz Chan

Registration Manager



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-600	2. EPA Product Manager Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PENDIMETHALIN TECHNICAL	PM# 25/Herbicide Branch	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of revised label deleting uses from the label. Details are in the cover letter accompanying this submission.

This notification is consistent with the provisions of PR Notice 98-10 and EPA Regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				<input type="checkbox"/> Other (Specify) _____	
If "Yes" Unit Packaging wgt.		No. per container			
If "Yes" Package wgt		No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Luz G Chan		Title Registration Manager	
		Telephone No (Include Area Code) (901) 774-4370	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Registration Manager	
4. Typed Name Luz G Chan		5. Date January 22, 2014	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

June 24, 2014

Luz Chan
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

Subject: Label Amendment – Voluntary Use Deletion on Alfalfa, Corn (field, pop, sweet), Garlic, Grain Sorghum, Onions (dry bulb, green, Welsh), Peanuts, Sugarcane, and Sunflower
Drexel Pendimethalin Technical
EPA Reg. No. 19713-600
Application Dated February 6, 2014

Dear Ms. Chan:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3. (emphasis added)

If you have any questions, please contact Mindy Ondish at (703)605-0723 or at ondish.mindy@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", enclosed within a hand-drawn oval.

Kable Bo Davis
Product Manager 25
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs



Drexel®

Pendimethalin Technical

Herbicide

For manufacturing use only.

ACTIVE INGREDIENT:

Pendimethalin 96.0%

OTHER INGREDIENTS: 4.0%

TOTAL: 100.0%

Contains nitrosoamines at levels less than 100 ppm.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

EPA Reg. No. 19713-600

EPA Est. No. 19713-XX-XXX

Net Content: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- Call a poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, OR EXPOSURE) CALL CHEMTREC: 1-800-424-9300

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or residues.

Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Each formulator is responsible for obtaining EPA registration for their formulated product(s).

Only for formulation into a herbicide for the following uses:

Grass grown for seed, Landscape or Ground maintenance, Noncrop-land areas, Ornamentals and Turfgrasses.

This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

ACCEPTED

06/24/2014

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under

EPA Reg. No. 19713-600

Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972

The Drexel logo is a registered trademark of Drexel Chemical Company.

600SP-0114*P
PENDIMETHALIN TECHNICAL Page 1 of 2

53

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.

CONTAINER DISPOSAL:

Nonrefillable Container (Flexible-bag—all weights): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (Rigid—Greater than 50 Lbs.): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least once complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Refillable Container: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining content from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

WARRANTY—CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty, nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE expressed or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. To the extent consistent with applicable law, Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with directions given herewith.



Drexel Chemical Company

February 6, 2014

Document Processing Desk (AMEND)
ATTN: MR. BO DAVIS, PM 25
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive, Arlington, VA 22202

***Re: Submission of Revised Label Deleting Uses per EPA's Letter dated February 6, 2014
DREXEL PENDIMETHALIN TECHNICAL (EPA Reg. No. 19713-600)***

Dear Mr. Davis,

In accordance with Section 6(f) of FIFRA as amended (7 U.S.C. 136 d(f)), Drexel Chemical Company would like to request voluntary cancellation of the following uses from the label of the above registration that was accepted by the Agency on February 2, 2009:

- Alfalfa
- Corn (Field, Pop, Sweet)
- Garlic
- Onions (Dry bulb, Green, Welsh)
- Peanuts
- Sorghum (Grain)
- Sugarcane
- Sunflower


In making this voluntary termination of uses request, Drexel also expressly requests a waiver of the 180-day comment period provided by the statute.

Enclosed, please find:

1. Completed EPA Form 8570-1
2. One copy of the label (600SP-0209*) accepted by the Agency on February 2, 2009 with the added uses marked up deleted.
3. Three clean copies of the label (600SP-0114*P) for your acceptance.

If you have questions/clarification or need anything further regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com. Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY


Luz G Chan
Registration Manager

1700 Channel Avenue . Post Office Box 13327 . Memphis, Tennessee 38113-0327
Phone: (901) 774-4370 . Fax: (901) 774-4666 . E-Mail: info@drexchem.com . www.DrexChem.com

SINCE 1972



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-600	2. EPA Product Manager Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PENDIMETHALIN TECHNICAL	PM# 25/Herbicide Branch	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated 2/6/2014	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of revised label deleting uses from the label. Details are in the cover letter accompanying this submission. Thank you.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Luz G Chan	Title Registration Manager	Telephone No. (Include Area Code) (901) 774-4370
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Registration Manager	
4. Typed Name Luz G Chan	5. Date February 6, 2014	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION,
PESTICIDES AND
TOXIC SUBSTANCES

July 17, 2012

I, Kable Davis, Herbicide Branch, Registration Division, Office of Pesticide Programs, Office of Prevention, Pesticides and Toxic Substances, United States Environmental Protection Agency ("EPA"), certify that the pesticide product (s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

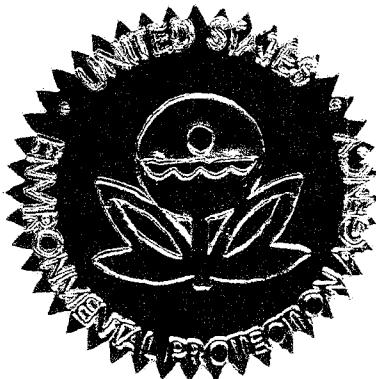
Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Argentina) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issued registration numbers for the product(s) listed below to:

Drexel Chemical Company
1700 Channel Avenue
13327
Memphis, TN 381130327

EPA Registration Number: 19713-600
Name of Product: PENDIMETHALIN TECHNICAL

Kable Davis
Risk Manager 25
Herbicide Branch
Registration Division (7505P)





Fw: DREXEL CHEMICAL COMPANY-Request for EPA Gold Seals

Kable Davis to: BettyR Williams

07/17/2012 08:17 AM

Hi Betty-

Please see below for some Gold Seal letter requests.

Thanks,
Bo

----- Forwarded by Kable Davis/DC/USEPA/US on 07/17/2012 08:16 AM -----

From: "Susan Lofton" <slofton@drexchem.com>
To: Kable Davis/DC/USEPA/US@EPA
Date: 07/16/2012 05:14 PM
Subject: DREXEL CHEMICAL COMPANY-Request for EPA Gold Seals

Dear Bo,

Drexel Chemical Company would like to request an EPA Gold Seal for the following currently registered products please:

PRODUCT: **DREXEL ATRAZINE 90DF**
EPA REG. NO. 19713-76
PM: Kable Bo Davis (25)
COUNTRY: ARGENTINA
QUANTITY NEEDED: 1 (ONE) ORIGINAL

PRODUCT: **DREXEL ATRAZINE TECHNICAL**
EPA REG. NO. 19713-566
PM: Kable Bo Davis (25)
COUNTRY: ARGENTINA
QUANTITY NEEDED: 2 (TWO) ORIGINALS

PRODUCT: **DREXEL TRIZMET II**
EPA REG. NO. 19713-547
PM: Kable Bo Davis (25)
COUNTRY: ARGENTINA
QUANTITY NEEDED: 1 (ONE) ORIGINAL

X PRODUCT: **DREXEL PENDIMETHALIN TECHNICAL**
EPA REG. NO. 19713-600
PM: Kable Bo Davis (25)
COUNTRY: ARGENTINA
QUANTITY NEEDED: 1 (ONE) ORIGINAL

PRODUCT: **DREXEL PIN-DEE 3.3 T&O**
EPA REG. NO. 19713-590
PM: Kable Bo Davis (25)
COUNTRY: ARGENTINA
QUANTITY NEEDED: 1 (ONE) ORIGINAL

Please mail to:
Susan Lofton
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

I can be reached at 901-774-4370, ext. 334 if you have any questions or need additional information. Thank you for your kind assistance.

Regards,
Susan

FOR OFFICIAL USE ONLY

FILE SYMBOL

19 7/3 - ANN

REGISTRATION NO.

CONFIDENTIAL STATEMENT OF FORMULA ENCLOSED

DATE SUBMITTED	SUBMITTED BY (/)	
	APPLICANT	BASIC SUPPLIER
6/14/06		

**Do Not Write Comments,
Formula, or Parts of Formula
on This Envelope**

NOTE

It shall be unlawful—for any person to use for his own advantage or to reveal, other than to the Secretary, or officials or employees of the United States Department of Agriculture or other Federal agencies, or to the courts in response to a subpoena, or to physicians, and in emergencies to pharmacists and other qualified persons, for use in the preparation of antidotes, in accordance with such directions as the Secretary may prescribe, any information relative to formulas of products acquired by authority of Section 4 of the "Federal Insecticide, Fungicide, and Rodenticide Act."

